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#### REDACTED FOR PUBLIC INSPECTION

October 30, 2018

#### VIA HAND DELIVERY

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> St. SW Room TW-B204 Washington, DC 20554

Re:

Securus Technologies Inc. and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations, WC Docket No. 18-193

Dear Ms. Dortch:

Inmate Calling Solutions, LLC d/b/a ICSolutions ("ICS") supplements its response to the Wireline Competition Bureau's ("WCB") Information and Document request ("Information Request") dated September 11, 2018 in connection with the above-referenced transaction. Specifically, enclosed please find data responding to Question 19 of the Information Request, in the format of the template accompanying the Information Request. In accordance with the Protective Order in this docket, <sup>1</sup> ICS also is submitting separately two sets of this filing to WCB staff.

This filing contains information that meets the requirements for treatment as "Confidential" or "Highly Confidential," under the Protective Order in this docket.<sup>2</sup> ICS is

<sup>&</sup>lt;sup>1</sup> Securus Technologies Inc., and Inmate Calling Solutions, LLC, Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations, Protective Order, WC Docket No. 18-193, DA No. 18-938 (rel. Sept. 11, 2018) ("Protective Order").

<sup>&</sup>lt;sup>2</sup> Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, the provided documents, unless specifically reviewed and downgraded, have been classified as "Highly Confidential."

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therefore submitting this filing pursuant to the staff's instructions and the procedures established in the Protective Order and in the Information Request.<sup>3</sup> ICS will also file a redacted version of this filing for public inspection in the Commission's Electronic Comment Filing System.

ICS has made diligent efforts to ensure that none of the material it is submitting herewith is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged materials may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ICS requests that any privileged materials inadvertently produced be returned to ICS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek return of any such documents.

If you have any questions arise concerning this submission, please contact the undersigned.

Very truly yours,

Howard M. Liberman

Counsel to Inmate Calling Solutions, LLC d/b/a ICSolutions

Enclosure

Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

<sup>&</sup>lt;sup>3</sup> Consistent with the Protective Order, *id.* at ¶ 3, ICS obtained written approval from Commission staff to designate certain material as Highly Confidential. Pursuant to discussions with staff, the provided documents, unless specifically reviewed and downgraded, have been classified as "Highly Confidential." Notwithstanding this default classification, ICS is not asserting Highly Confidential status for any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

# ATTACHMENT REDACTED